

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN RE: MULTIPLAN HEALTH  
INSURANCE PROVIDER LITIGATION

This Document Relates To:

ALL DIRECT ACTIONS

Case No. 1:24-cv-6795

MDL No. 3121

Hon. Matthew F. Kennelly

**DECLARATION OF SADIK HUSENY IN SUPPORT OF DEFENDANTS’  
JOINT MOTION TO DISMISS THE CONSOLIDATED MASTER DIRECT ACTION  
PLAINTIFF COMPLAINT AND DIRECT ACTION PLAINTIFFS’ SHORT-FORM  
COMPLAINTS**

I, Sadik Huseny, declare as follows:

1. I am a partner with the law firm Latham & Watkins LLP, attorneys for Defendants MultiPlan, Inc., MultiPlan Corporation, Viant, Inc., Viant Payment Systems, Inc., National Care Network, LLC, and Medical Audit & Review Solutions, Inc. in connection with this action. I submit this Declaration in support of Defendants’ Joint Motion to Dismiss the Consolidated Direct Action Plaintiff Complaint and Plaintiffs’ Short Form Complaints in the above captioned matter.

2. Attached as **Exhibit A** to this Declaration is a true and correct copy of a MultiPlan document titled “A Better Reference for Pricing,” dated August 2019.

3. Attached as **Exhibit B** to this Declaration is a true and correct copy of a MultiPlan document titled “Data iSight Product and Methodology Inpatient Module,” dated June 2019.

4. Attached as **Exhibit C** to this Declaration is a true and correct copy of a MultiPlan document titled “Data iSight Facility Methodology,” dated July 2018.

I declare under penalty of perjury that the foregoing is true and correct, and that this Declaration was made this 16th day of January 2025.

/s/ Sadik Huseny  
Sadik Huseny  
of Latham & Watkins LLP

*Counsel for Defendants MultiPlan, Inc.,  
MultiPlan Corporation; Viant, Inc.; Viant  
Payment Systems, Inc.; National Care  
Network, LLC; and Medical Audit & Review  
Solutions, Inc.*